

[ORAL ARGUMENT NOT YET SCHEDULED]

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

ASSOCIATED PRESS,

Plaintiff-Appellee,

v.

TAYLOR BUDOWICH, in his official
capacity as White House Deputy Chief of
Staff; KAROLINE C. LEAVITT, in her
official capacity as White House Press
Secretary; and SUSAN WILES, in her
official capacity as White House Chief of
Staff,

Defendants-Appellants.

No. 25-5109

**NONBINDING STATEMENT
OF ISSUES TO BE RAISED ON APPEAL**

Defendant-appellants anticipate raising the following issue:

Whether the district court erred in entering a preliminary
injunction prohibiting defendants from considering the Associated
Press's viewpoint when granting discretionary access to the Oval Office
and other restricted spaces that is not made available to all
credentialed members of the White House press corps.

Respectfully submitted,

JOSHUA M. SALZMAN

/s/ Steven A. Myers

STEVEN A. MYERS

*Attorneys, Appellate Staff
Civil Division, Room 7232
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530
(202) 305-8648*

Dated: May 12, 2025